

**MILLER
& MARTIN**
PLLC
ATTORNEYS AT LAW

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TRA DOCKET ROOM

1200 ONE NASHVILLE PLACE
150 FOURTH AVENUE, NORTH
NASHVILLE, TENNESSEE 37219-2433
(615) 244-9270
FAX (615) 256-8197 OR (615) 744-8466

Melvin J. Malone

Direct Dial (615) 744-8572
mmalone@millermartin.com

May 17, 2004

VIA HAND DELIVERY

Honorable Deborah Taylor Tate, Chairman
c/o Sharla Dillon, Docket & Records Manager
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee, 37243-0505

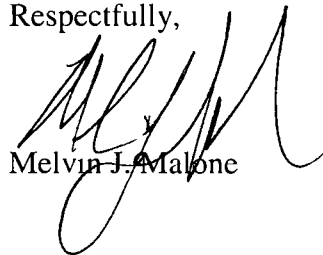
**RE: Tennessee Coalition of Rural Incumbent Telephone Companies and
Cooperatives Request for Suspension of Wireline to Wireless Number
Portability Obligations Pursuant to Section 251(f)(2) of the
Communications Act of 1934, as Amended
TRA Docket # 03-00633**

Dear Chairman Tate:

Enclosed please find one (1) original and thirteen (13) copies of Verizon Wireless's Discovery Requests to Each of the Members of the Tennessee Coalition of Rural Incumbent Telephone Companies and Cooperatives. Also enclosed is a copy of the document to be "filed stamped" for our records.

If you have any questions or require additional information, please let me know.

Respectfully,



Melvin J. Malone

MJM/cgb

Enclosures

cc R. Dale Grimes
Timothy C. Phillips
Edward Phillips

IN RE:)
)
TENNESSEE COALITION OF RURAL)
INCUMBENT TELEPHONE COMPANIES) **DOCKET NO. 03-00633**
AND COOPERATIVES REQUEST FOR)
SUSPENSION OF WIRELINE TO WIRELESS)
NUMBER PORTABILITY OBLIGATIONS)
PURSUANT TO SECTION 251(f)(2) OF THE)
COMMUNICATIONS ACT OF 1934, AS)
AMENDED)
)
)

Cellco Partnership d/b/a Verizon Wireless (“Verizon Wireless”), by and through its attorneys, Miller & Martin, PLLC, hereby propounds its Discovery Requests separately and independently upon each member of the Tennessee Coalition of Rural Incumbent Telephone Companies and Cooperatives (the “Coalition”), referred to separately and individually herein as Respondent, pursuant to the Rules of the Tennessee Regulatory Authority (“TRA” or “Authority”) and the Tennessee Rules of Civil Procedure. These Discovery Requests include requests for copies of documents as provided by the Tennessee Rules of Civil Procedure. Answers must be served consistent with the Procedural Schedule established by the Hearing Officer in this matter. Each member of the Coalition should provide separate answers to these Discovery Requests, except to the extent that the answer to a particular question is the same for all or some portion of the Coalition members.

Responses should be delivered in accordance with the instructions below:

DEFINITIONS AND INSTRUCTIONS

1. "Relate to" or "refer to" shall mean, in addition to their customary and usual meaning, to reflect on, to pertain to, support, evidence, constitute, or mention.

2. "And" as well as "or" are to be construed either disjunctively or conjunctively so as to bring within the scope of this request any matters that might be construed outside its scope.

3. "Communication" or "communications" shall mean all meetings, conversations, conferences, discussions, correspondence, messages, telegrams, telefax, mailgrams, and all oral and written expressions or other occurrences whereby thoughts, opinions or data are transmitted between two or more persons.

4. "CMRS" and "Commercial Mobile Radio Service" shall have the meaning defined and used by the Federal Communications Commission. *See* 47 C.F.R. §§ 20.3, 20.9(a)(4), (7), (11).

5. "Identify" or "state the identity of" means:

(a) In the case of a person, to state the name; last known residence; current or last known employer or business affiliation; and current or last known occupation and business position held.

(b) In the case of a company, to state the name; if incorporated, the place of incorporation; the principal place of business; and the identity of the person(s) having knowledge of the matter with respect to which the company is named.

(c) In the case of a document, to state the identity of the person(s) who prepared it; the sender and recipient; the title or a description of the general nature of the subject matter; the date of preparation; the date and manner of distribution and

publication; the location of each copy and the identity of the present custodian; and the identity of the person(s) who can identify it.

(d) In the case of an act or event, to state a complete description of the act or event; when it occurred; where it occurred; the identity of the person(s) performing said act (or omission); the identity of all persons who have knowledge, information or belief about the act; when the act, event, or omission first became known; the circumstances; the manner in which such knowledge was first obtained, and the documents or other writings which memorialize the instance

6. "Oral communication" shall mean any verbal conversation or other statement from one person to another, including but not limited to, any interview, conference, meeting or telephone conversation.

7. "Person" or "Persons" shall mean any individual, association, partnership, corporation, firm, organization, or entity.

8. "Concerning" and "concern" shall mean memorializing, mentioning, to be connected with, comprising, consisting, indicating, describing, referring, relating to, evidencing, showing, discussing, or involving in any way whatsoever the subject matter of the request or question.

9. The terms "document" or "documents" are intended to be comprehensive, including without limitation any kind of written or graphic material, whether typed, handwritten, printed, computer-generated, or matter of any kind from which information can be derived, however produced, reproduced or stored on paper, cards, machines, tapes, film, electronic facsimile, disks, computer tapes, printouts, computer programs or computer storage devices or any other medium, of any nature whatsoever, including all originals, copies and drafts.

10. "Respondent," "you" and "your" shall mean or refer to each member of the Coalition separately and individually, its predecessor(s), if any, as well as its divisions, parent and subsidiary entities, all related companies, and the officers, directors, employees, agents, representatives, and other personnel thereof, and any entity through which Respondent provides telephone service in Tennessee.

11. All documents requested herein are all those in the custody of, possession of, or control of the Respondent or its experts, consultants, agents, employees or representatives (including attorneys), or to which the Respondent or its experts, consultants, agents, employees or representatives (including attorneys) have access.

12. The information requested herein is intended to include all knowledge and information of Respondent in its corporate capacity, and includes, unless otherwise specifically indicated, its predecessors, agents, legal representatives, divisions, subsidiary entities, both controlled and wholly-owned, and all other related companies (as defined by 15 U.S.C. § 1127), and the past and present officers, directors, employees, agents, representatives, attorneys and other personnel thereof, as well as each entity through which Respondent provides telephone service in Tennessee.

13. These Discovery Requests are deemed continuing in nature, requiring Respondent to serve upon Verizon Wireless further responses promptly after Respondent has acquired additional knowledge or information.

14. If any of the information requested cannot be furnished, please indicate what information is not being provided and the reason that it cannot be provided.

15. If the Respondent asserts any privilege as to any documents responsive to these requests, it shall identify the author(s) of the document, the addressee(s), the recipients(s) of copies, all

persons having knowledge of any facts relating to your claim of privilege, the date of the document, the nature of the document (e.g., letter, memorandum, handwritten notes), the length of the document, the document's current location, and the specific reason(s) why the Respondent contends that the document is privileged or otherwise protected from discovery.

16. If you object to any request or subpart thereof, or otherwise withhold responsive information on grounds other than those covered in 15 above,:

- (a) identify the request or question and subpart to which objection is made;
- (b) state whether the information is found in a document, oral communication, or in some other form;
- (c) identify all grounds for objection, and set forth the factual basis for assertion of the objection; and
- (d) identify the information withheld by description of the topic or subject matter, the date of the communication, and the participants.

17. If you object to any portion of a request or question, explain your objection and answer the remainder.

18. The response to each request or question should begin on a new page. As part of each response, please identify the request or question to which the response is made by typing it at the top of the page. In addition, provide the name, job title and phone number of the person or persons responsible for providing the information requested for each request or question.

19. Documents provided as part of a response should be attached to the sheet containing the response. Each page of all documents provided in response to any request or question should be clearly marked with the request or question number, unless stapled together, in which case only the first page need be marked.

20. If necessary, Petitioner is willing to sign a protective agreement to obtain the information requested herein upon terms to be agreed upon.

21. Under the circumstances, we request that Responses be provided in both paper and electronic format. Paper responses may be delivered via Regular U.S. Mail if an electronic version of the response has been already provided. Electronic versions of each response shall be provided in the same format as the original document (e.g., Microsoft Word for Windows, Microsoft Excel for Windows, etc.). To the extent possible, electronic responses shall also be provided in Adobe Acrobat PDF Format. Responses shall be provided as follows:

Melvin J. Malone
J. Barclay Phillips
Miller & Martin, PLLC
1200 One Nashville Place
150 Fourth Avenue, North
Nashville, Tennessee 37219-2433

Attorneys for Verizon Wireless

E-Mail: mmalone@millermartin.com
cphillips@millermartin.com

As required by the rules of the Authority, a verification or signature of an official or counsel for the Respondent is requested with the answers to these Discovery Requests as an indication of the genuineness and completeness of the responses and documents provided.

DISCOVERY REQUESTS

- 1.01. If any, please provide any and all information, documents and any other material the Respondent has previously provided in the above-captioned proceeding, formally or informally, to any other party
- 1.02. Please provide any and all documents and other material provided by the Respondent to the Authority, on a formal or informal basis, in connection with the Petition and the Amended Petition in the above-captioned proceeding, other than those documents and materials readily available and accessible from the Authority's public web site
- 1.03. Please provide any and all documents in the Respondent's possession, or relied upon by the Respondent in the above-captioned proceeding, that discuss the economic burden of providing wireline-to-wireless local number portability typically associated with efficient competitive entry in the State of Tennessee.
- 1.04. Has the Respondent petitioned the Federal Communications Commission ("FCC") for a rehearing, reconsideration, waiver, or exemption from the FCC's wireline-to-wireless local number portability orders?
 - a.) If the answer to Request 1.04 is anything other than an unequivocal "no," please provide the FCC Docket No. of such filing
- 1.05. Has the Respondent participated as a named party to any appeal of the Federal Communications Commission's ("FCC") wireline-to-wireless local number portability orders?

- a.) If the answer to Request 1.05 is anything other than an unequivocal “no,” please provide the name of the Court and the Docket No. of such filing.
- 1.06. Has the Respondent ever received a bona fide request for interconnection, services, or network elements pursuant to Section 251(f)(1)(A) of the Federal Telecommunications Act, 47 U.S.C. §251(f)(1)(A)?
- a.) If the answer to Request 1.06 is anything other than an unequivocal “no,” please provide the name of the requesting provider(s) and the date of such request(s).
 - b.) If the answer to Request 1.06 is anything other than an unequivocal “no,” please provide the Tennessee Regulatory Authority Docket Nos. in which the Authority considered whether or not to allow the Respondent’s rural exemption to remain in place.
- 1.07. Does the Respondent currently include any charge or fee for implementation of Local Number Portability on its customers’ telephone bill or invoice?
- 1.08. Has the Respondent ever included any charge or fee for implementation of Local Number Portability on its customers’ telephone bill or invoice?
- 1.09. If the answer to Request 1.07 or to Request 1.08 is anything other than an unequivocal “no,” please provide the following:
- a.) The dates that such fees were collected.
 - b.) The amounts included on each customers’ telephone bill or invoice.
 - c.) The aggregate amount of such fees collected by the Respondent for each month in which such fees were collected.

- 1.10. Please provide copies of any studies conducted by the Respondent or on its behalf regarding the potential demand for wireline-to-wireless local number portability in the Respondent's service territory.
- 1.11. Please provide copies of those pages of the Respondent's tariff defining or rating what is a "local call," including any list of exchanges to which a call is rated as a local call.
- 1.12. Please identify, by Common Language Location Codes ("CLLI Codes") and street address, all BellSouth Telecommunications, Inc. and United Telephone-Southeast (Sprint) tandems to which the Respondent directly transports telephone calls which are rated as local calls for termination to other local exchange carriers.
- 1.13. Please identify all other local exchange carriers to which the Respondent directly transports local telephone calls for termination by that other local exchange carrier(s).
- 1.14. If Respondent were to comply with the FCC's order to provide wireline-to-wireless local number portability, please describe in detail what "customer education" efforts will have to be undertaken in connection with any offering of wireline-to-wireless number portability, on an initial and ongoing basis.
- 1.15. Please indicate if you participated in or are covered by the cost support model filed by the National Exchange Carriers Association (NECA) in a local number portability filing, which they made with the FCC in NECA's Transmittal #956.
- 1.16. Please provide copies of any Interconnection Agreements or other contracts Respondent has entered into, or has in effect, governing the transport and termination of calls between Respondent and other local exchange providers.

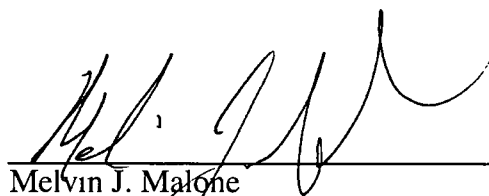
- 1.17. Please provide copies of any Interconnection Agreements or other contracts Respondent has entered into or has in effect governing the transport and termination of calls between Respondent and any Commercial Mobile Radio Service ("CMRS"), Personal Communication System ("PCS"), Cellular or Wireless Providers.
- 1.18 Has Respondent responded to any correspondence, requests, inquires, or Bona Fide Requests received from Commercial Mobile Radio Service ("CMRS"), Personal Communication System ("PCS"), Cellular or Wireless Providers regarding wireline-to-wireless local number portability?
- a.) If the answer to Request 1.18 is anything other than an unequivocal "no," please provide copies of all such responses.
- 1.19. Please explain in substantive detail any and all actions and initiatives, including, but not limited to, estimates, quotes, purchase orders, vendor commitments, and the like in relation to any necessary equipment or software, that Respondent has undertaken to comply with the FCC's LNP implementation requirements. For each such action or initiative, please provide the dates on which the action or initiative was taken and any information or documentation related thereto in Respondent's possession or control regarding the action or initiative.
- 1.20. To the extent not answered and provided in Request 1.19 above, please provide the status, with documentation, of any and all pending purchase orders of LNP necessary equipment or software, including the expected dates of delivery, installation, and testing.

- 1.21. Is there any equipment, software, and/or network upgrade necessary to become LNP compliant that you have not already ordered? If so, please identify the same with specificity.
- 1.22. Please identify the switch designation(s) and exchange(s) for which suspension is being sought?
- 1.23. Is Respondent prepared to properly route and deliver calls to wireless telephone numbers which have been ported between Commercial Mobile Radio Service ("CMRS"), Personal Communication System ("PCS"), Cellular or Wireless Providers?
- a.) If the answer to Request 1.23 is anything other than an unequivocal "no," please describe the steps and procedures Respondent has implemented to route and deliver such calls.
- b.) If the answer to Request 1.23 is "no," please describe why Respondent has not taken such steps.
- 1.24. Will you be LNP compliant on or before May 24, 2004? If you answered in the affirmative, explain, with specificity, your understanding of LNP compliant.
- 1.25. If you answered in the negative to Request 1.24, with respect to your non-portability switches, have you made arrangements with other parties to properly route calls originated by customers served by such switches to ported numbers until you are able to perform this function? If you answered in the affirmative, please explain said arrangements with particularity.

- 1.26. Do you have any "Type 1" numbering arrangements with any wireless carriers? If so, please identify the wireless carriers that are the recipients thereunder.
- 1.27. Did Respondent serve copies of its Petition and its Amended Petition, in the above-captioned proceeding, upon any wireless carriers from which Respondent received correspondence, requests, inquiries, or Bona Fide Requests regarding wireline-to-wireless local number portability?

Respectfully submitted,

By:



Melvin J. Malone
J. Barclay Phillips
Miller & Martin, PLLC
1200 One Nashville Place
150 Fourth Avenue, North
Nashville, Tennessee 37219-2433

(615) 244-9270
(615) 256-8197 or (615) 744-8466 Fax

Attorneys for Cellco Partnership d/b/a
Verizon Wireless.

Anne Hoskins
Lolita Forbes
Counsel for Cellco Partnership d/b/a Verizon Wireless

May 17, 2004

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served by U S Mail, postage prepaid, this 17 day of May, 2004, upon the following:

R. Dale Grimes
Bass, Berry & Sims PLC
AmSouth Center
315 Deaderick Street, Suite 2700
Nashville, Tennessee 37238-3001

Timothy C. Phillips
Asst. Attorney General
Office of the Attorney General
P.O. Box 20207
Nashville, Tennessee 37202

AnneHoskins
LolitaForbes
VerizonWireless
1300"Eye"StreetN.W.
Suite400West
Washington,DC20005

E-Mail:anne.hoskins@verizonwireless.com
lolita.forbes@verizonwireless.com



Melvin J. Malone